

### **REMARKS/ARGUMENTS**

The claims have been amended as set forth above. Applicant believes that the claims are in condition for allowance. Reconsideration is respectfully requested.

#### **I. Claim Objections**

The independent claims were objected to as including a minor typographical error. The typographical error has been remedied as set forth above. Applicant believes that the objection has been overcome.

#### **II. Rejection Under 35 U.S.C. § 103(a)**

Claims 24-26, 28-33, 35-40 and 42-44 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,804,705 issued to Greco et al. (hereinafter "Greco") in view of U.S. Patent No. 6,466,900 issued to Lissauer et al. (hereinafter "Lissauer"). Claims 27, 34 and 41 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Greco in view of Lissauer, as applied to claim 24 above, and further in view of U.S. Patent No. 6,338,033 issued to Bourbonnais et al. (hereinafter "Bourbonnais").

In light of the above amendments, applicant respectfully disagrees with the rejections. Independent claim 24 includes the following combination of features that is not taught or otherwise suggested by the cited references:

obtaining an original pre-translated word processing document, wherein the original pre-translated word processing document includes word processing text elements and non-word processing text elements;

receiving a request on a word processor associated with the original pre-translated word processing document to translate the original pre-translated word processing document from a first language to a second language;

sending a request to a redirector server for an address of a translation service for translating the original pre-translated word processing document from the first language to the second language, wherein the request includes a language identifier for the first language and a language identifier for the second language;

receiving, from the redirector server, the address for a translation service for translating the original pre-translated word processing document from the first

language to the second language in accordance with the language identifier for the first language and the language identifier for the second language;

saving, on a user computer, a first version of the original pre-translated word processing document, wherein the first version includes the word processing text elements and the non-word processing text elements;

generating a second version of the original pre-translated word processing document, wherein the second version includes:

an identifier of the first language and an identifier of the second language,

tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and

the word processing text elements; and

sending the second version to the translation service indicated by the address received from the redirection server;

receiving a translated second version from the translation service, wherein the translated second version includes the tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and the word processing text elements translated from the first language to the second language according to the identifier of the first language and the identifier of the second language;

obtaining the non-word processing text elements of the first version by implementing the links of the translated second version to retrieve the non-word processing text elements from the saved first version of the original pre-translated word processing document; and

displaying the translated second version with the non-word processing text elements populated from the links, wherein the translated second version is displayed in a display format of the original pre-translated word processing document.

The references do not teach or otherwise suggest the above combination of features. Greco teaches an electronic document service. (Greco at Abstract). One of the user interfaces in

Greco is a translation service. (Greco, Col. 4, lines 59-60). Greco teaches translation in general. Greco teaches that:

The Translation Service button 430 may initiate a function to translate a document into one or more languages. This function may provide varying degrees of translation, from a quick, rough translation to a formal and official translation. The user may provide the document electronically to a secure location of a service provider. The service provider may translate the document, as appropriate, and return the translated document to the user.

(Greco, Col. 9, lines 19-25). Here, Greco is teaching the general concept of submitting an electronic document for translation. Greco does not teach how the document is processed to provide efficient translation that preserves the format of the original document.

With regard to Lissauer, Lissauer teaches a language database for an application program. Lissauer teaches a database of languages to associate with an application program. The database of languages allows a user to select between application languages during runtime. The databases associated with the application provide real time translation of phrases of the application. The words of the phrase are queried against the database to find translation phrases. (Lissauer, Col. 4, lines 15-26). Lissauer teaches that the translation text is stored in a database. The database does not include images. The database includes a path and file name to the images. (Lissauer, Col. 4, lines 15-29). Lissauer does not pertain to the configuration of the second document to provide efficient translation that maintains the initial format of the original document. Again, Lissauer teaches a database configuration for the runtime of an application. Bourbonnais teaches that HTML documents can be translated. (Bourbonnais, Col. 7, lines 15-30). However, Bourbonnais does not teach the generation of an HTML document to provide the efficient translation and removal of non-text-based objects.

The translation features of the independent claims are tied to the generation of the second document, the features of the second document and the generation of the translated second document. The Office Action attempts to piece together a reference that recites electronic document translation in general, a reference that recites the generation of a database that has multiple languages, and a reference that recites that HTML can be translated. Applicant believes that the claims are not being read in their entirety.

Independent claim 24 recites "generating a second version of the original pre-translated word processing document, wherein the second version includes: an identifier of the first language and an identifier of the second language, tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and the word processing text elements." As indicated in the Office Action, Greco does not teach this feature. Also, Lissauer does not pertain to a second document structured as such. Lissauer teaches configuring a database for runtime translation in an application. Moreover, Bourbonnais teaches that HTML can be translated, but Bourbonnais does not teach the components of the HTML that provide the advantages as indicated in the current specification. Bourbonnais does not teach a second document that includes an identifier of the first language and an identifier of the second language. Also, Bourbonnais does not teach that a second version of the document includes tags that point to the non-word processing elements and includes the word processing text elements.

Independent claim 24 recites "receiving a translated second version from the translation service, wherein the translated second version includes the tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and the word processing text elements translated from the first language to the second language according to the identifier of the first language and the identifier of the second language." Again, Greco teaches, in general, the submission of an electronic document for translation. Lissauer teaches the configuration of an electronic database for runtime translation in an application. Bourbonnais teaches that HTML can be translated. The HTML in Bourbonnais is not structured in the manner set forth above and cannot provide the benefits set forth in the specification. The HTML in Bourbonnais is a document sent for translation. It is not the second document being returned from translation. Accordingly, applicant asserts that independent claim 24 is in condition for allowance.

Independent claim 31 includes the following combination of features that is not taught or otherwise suggested by the cited references:

obtaining an original pre-translated word processing document, wherein the original pre-translated word processing document includes word processing text elements and non-word processing text elements;

receiving a request on a word processor associated with the original pre-translated word processing document to translate the original pre-translated word processing document from a first language to a second language;

sending a request to a redirector service for an identifier of a translation service for translating the original pre-translated word processing document from the first language to the second language;

receiving, from the redirector service, the identifier for a translation service for translating the original pre-translated word processing document from the first language to the second language;

saving, on a user computer, a first version of the original pre-translated word processing document, wherein the first version includes the word processing text elements and the non-word processing text elements;

generating a second version of the original pre-translated word processing document, wherein the second version is a mark-up language document that is generated to include:

an identifier of the first language and an identifier of the second language,

tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer,  
and

the word processing text elements; and

sending the second version to the translation service indicated by the identifier received from the redirection service;

receiving a translated second version from the translation service, wherein the translated second version includes the tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and the word processing text elements translated from the first language to the second language according to the identifier of the first language and the identifier of the second language;

obtaining the non-word processing text elements of the first version by implementing the links of the translated second version to retrieve the non-word processing text elements from the saved first version of the original pre-translated word processing document; and

*displaying the translated second version with the non-word processing text elements populated from the links.*

The above combination of features is not taught or otherwise suggested by the cited references. The translation features of the independent claims are tied to the generation of the second document, the features of the second document and the generation of the translated second document. The Office Action attempts to piece together a reference that recites electronic document translation in general, a reference that recites the generation of a database that has multiple languages, and a reference that recites that HTML can be translated. Applicant believes that the claims are not being read in their entirety.

Independent claim 31 recites "generating a second version of the original pre-translated word processing document, wherein the second version is a mark-up language document that is generated to include: an identifier of the first language and an identifier of the second language, tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and the word processing text elements." As indicated in the Office Action, Greco does not teach this feature. Also, Lissauer does not pertain to a second document structured as such. Lissauer teaches configuring a database for runtime translation in an application. Moreover, Bourbonnais teaches that HTML can be translated, but Bourbonnais does not teach the components of the HTML that provide the advantages as indicated in the current specification. Bourbonnais does not teach a second document that includes an identifier of the first language and an identifier of the second language. Also, Bourbonnais does not teach that a second version of the document includes tags that point to the non-word processing elements and includes the word processing text elements.

Independent claim 31 recites "receiving a translated second version from the translation service, wherein the translated second version includes the tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, and the word processing text elements translated from the first language to the second language according to the identifier of the first language and the identifier of the second language." Again, Greco teaches, in general, the submission of an electronic document for translation. Lissauer teaches the configuration of an electronic database for runtime translation

in an application. Bourbonnais teaches that HTML can be translated. The HTML in Bourbonnais is not structured in the manner set forth above and cannot provide the benefits set forth in the specification. The HTML in Bourbonnais is a document sent for translation. It is not the second document being returned from translation. Accordingly, applicant asserts that independent claim 31 is in condition for allowance.

Independent claim 38 includes the following combination of features that is not taught or otherwise suggested by the cited references:

a processor; and

a memory having computer-executable instructions stored thereon, the instructions including:

obtaining an original pre-translated word processing document, wherein the original pre-translated word processing document includes word processing text elements and non-word processing text elements;

receiving a request on a word processor associated with the original pre-translated word processing document to translate the original pre-translated word processing document from a first language to a second language;

sending a request to a redirector service for an identifier of a translation service for translating the original pre-translated word processing document from the first language to the second language;

receiving, from the redirector service, the identifier for a translation service for translating the original pre-translated word processing document from the first language to the second language;

saving, on a user computer, a first version of the original pre-translated word processing document, wherein the first version includes the word processing text elements and the non-word processing text elements;

generating a second version of the original pre-translated word processing document, wherein the second version is HTML that is generated to include:

an identifier of the first language and an identifier of the second language,

tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer,

the word processing text elements, and

an identifier of the current user interface language of the word processor on the user computer;

sending the second version to the translation service indicated by the identifier received from the redirection service;

receiving a translated second version from the translation service, wherein the translated second version includes the tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, the word processing text elements translated from the first language to the second language according to the identifier of the first language and the identifier of the second language, and additional content from the translation service in a language identified by the identifier of the current user interface language of the word processor;

obtaining the non-word processing text elements of the first version by implementing the links of the translated second version to retrieve the non-word processing text elements from the saved first version of the original pre-translated word processing document; and

displaying the translated second version with the non-word processing text elements populated from the links, wherein the additional content from the translation service is displayed in the language identified by the identifier of the current user interface language of the word processor.

The above combination of features is not taught or otherwise suggested by the cited references. The translation features of the independent claims are tied to the generation of the second document, the features of the second document and the generation of the translated second document. The Office Action attempts to piece together a reference that recites electronic document translation in general, a reference that recites the generation of a database that has multiple languages, and a reference that recites that HTML can be translated. Applicant believes that the claims are not being read in their entirety.



Independent claim 38 recites "generating a second version of the original pre-translated word processing document, wherein the second version is HTML that is generated to include: an identifier of the first language and an identifier of the second language, tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, the word processing text elements, and an identifier of the current user interface language of the word processor on the user computer." As indicated in the Office Action, Greco does not teach this feature. Also, Lissauer does not pertain to a second document structured as such. Lissauer teaches configuring a database for runtime translation in an application. Moreover, Bourbonnais teaches that HTML can be translated, but Bourbonnais does not teach the components of the HTML that provide the advantages as indicated in the current specification. Bourbonnais does not teach a second document that includes an identifier of the first language and an identifier of the second language. Also, Bourbonnais does not teach that a second version of the document includes tags that point to the non-word processing elements and includes the word processing text elements.

Independent claim 38 recites "receiving a translated second version from the translation service, wherein the translated second version includes the tags that point to the non-word processing elements saved on the first version of the word processing document stored on the user computer, the word processing text elements translated from the first language to the second language according to the identifier of the first language and the identifier of the second language, and additional content from the translation service in a language identified by the identifier of the current user interface language of the word processor." Again, Greco teaches, in general, the submission of an electronic document for translation. Lissauer teaches the configuration of an electronic database for runtime translation in an application. Bourbonnais teaches that HTML can be translated. The HTML in Bourbonnais is not structured in the manner set forth above and cannot provide the benefits set forth in the specification. The HTML in Bourbonnais is a document sent for translation. It is not the second document being returned from translation.

Moreover, independent claim 38 recites that the HTML includes "an identifier of the current user interface language of the word processor on the user computer." Independent claim 38 also recites that the translated second document includes "additional content from the

translation service in a language identified by the identifier of the current user interface language of the word processor.” Independent claim 38 further recites “displaying the translated second version with the non-word processing text elements populated from the links, wherein the additional content from the translation service is displayed in the language identified by the identifier of the current user interface language of the word processor.” The specification of the current application specifically recites that:

This is an LCID that indicates the user's current user interface language for the application. It is important that the user interface language be designated as a parameter of the request for example, a Dutch user interface, so that any additional content from the translation provider that is returned along with the translated results, such as links to help or advertisement of other translation services, can be provided in the user's preferred user interface language.

Applicant can find no teaching or suggestion in any of the references of the above features. Accordingly, applicant asserts that independent claim 38 is allowable over the cited references.

With regard to the dependent claims, the dependent claims include features that are not taught or otherwise suggested by the cited references. Moreover, those claims ultimately depend from the independent claims set forth above. As such, they should be allowable for at least those same reasons.

### **III. Request for Reconsideration**

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

U.S. Patent Application Serial No. 09/876,361  
Amendment dated June 10, 2008  
Reply to Office Action of April 11, 2008

Respectfully submitted,

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